



# United States Department of the Interior

## FISH AND WILDLIFE SERVICE

Ecological Services  
Stadium Centre Building  
711 Stadium Drive, Suite 252  
Arlington, Texas 76011

September 10, 1999

Colonel James S. Weller  
District Engineer  
(Attn: CESWF-EV-EE)  
U.S. Army Corps of Engineers  
P.O. Box 17300  
Fort Worth, Texas 76102-0300

Dear Colonel Weller:

The United States Fish and Wildlife Service has recently reviewed the Public Notice, draft Finding of No Significant Impact (FONSI), and Programmatic Environmental Assessment (PEA) regarding the environmental impacts of more than 300 individual development actions being proposed by 18 public and private entities within the next 10 years on Federal lands around Lewisville Lake, Denton County, Texas.

It is stated in the PEA that there are no known federally listed threatened or endangered species that occur on or near Lewisville Lake. However, according to our records two federally listed species, the threatened bald eagle (*Haliaeetus leucocephalus*) and the threatened piping plover (*Charadrius melodus*), have been documented at the lake in recent years with the piping plover documented as recently as 1998. Based upon available information, the Service concurs that the anticipated cumulative impacts of the proposed actions are not likely to adversely affect any federally listed species. However, should bald eagles, piping plovers, or any other listed species be discovered utilizing areas in or near proposed or active construction/development sites, all proposed and active development should immediately cease. Further coordination with the Service would be required.

According to the PEA, environmental impacts from two proposed utility projects within existing easements would have significant impacts to vegetation and wildlife. The City of Lewisville is proposing both of these projects. One is the construction of two, five-million gallon aboveground storage tanks across from the Feaster Pump Station, while the other is the construction of a water treatment plant and ground storage facility on approximately 28 acres currently leased from the Corps by Lewisville Lake Environmental Learning Area (LLELA) on the southeast corner of Kealy and Jones Street. The proposed water tanks and water treatment plant are both located on lands designated for wildlife management with a large wooded wetland and significant stand of

mature bottomland hardwoods, respectively. We believe development on lands already designated for wildlife management which contain quality terrestrial resources such as wetlands and mature bottomland hardwoods should be avoided. If avoidance of these sites is not possible, we recommend that mitigation measures beyond those considered in the PEA be identified and implemented.

Overall, we believe the mitigation guidelines defined in the PEA are sufficient to avoid, minimize, and compensate for impacts of development activities. We commend the Corps' efforts regarding the compensatory mitigation tables developed in this PEA. However, when projects require mitigation, we request the Corps remind applicants that the suggested mitigation ratios for wetlands and vegetation/habitat are for guidance purposes only and that each project will be assessed individually. We realize the Corps wants to provide guidance to potential applicants so they recognize there would be costs for impacts to the environment, but we are also concerned applicants would expect this guidance to be followed consistently.

The Service also questions whether rating the value of vegetation/habitat by flood event frequency would provide accurate results in all locations. For example, mature bottomland hardwoods within the 5-year flood zone would only require a maximum compensatory mitigation ratio of 3:1 using the tables developed. In Texas, mature bottomland hardwoods are often given a resource category 2 habitat designation by the FWS with a mitigation goal of "no net loss" of in-kind habitat value. Therefore, if impacts are not avoidable, the Service could potentially require mitigation much higher than 3:1. Perhaps, a mitigation ratio based on a combination of habitat type, quality, and abundance would be more appropriate for determining the amount of mitigation required for development actions.

In anticipation of future utility lines being proposed around the lake, the Corps proposes to establish permanent utility easements either on or adjacent to existing easements at Lewisville Lake. We agree that using these proposed easements to place as many utilities as possible would reduce environmental impacts to these corridors and prevent future fragmentation of natural resource lands.

The existing undeveloped Corps' owned property provides (or would provide over time) some of the best wildlife habitat and open space available in the area. Therefore, the Service concurs with the Corps proposal to reallocate approximately 2,600 acres of designated low-density recreation lands to wildlife management lands. To prevent further fragmentation and provide protection to remaining Federal lands around Lewisville Lake facing the imminent threat of urban development, we recommend that the land use nomenclature of remaining fee areas not presently designated as either "Congress Authorized Parks and Recreation" or "Operation and Maintenance" should be upgraded to "Wildlife Management Lands" through a supplement to the lake master plan. Additionally, mitigation areas for development actions located within "Wildlife Management Lands" should be further designated as "Environmental Sensitive Areas" to provide further protection for fish and wildlife resources.

We appreciate the opportunity to provide input on the proposed action. If you have any questions, please contact Mike Armstrong of my staff at (817) 277-1100.

Sincerely,

A handwritten signature in cursive script that reads "Tom Cloud".

Thomas J. Cloud, Jr.  
Field Supervisor



October 7, 1999

Mr. William Fickel, Jr.  
Chief, Environmental Division  
Department of the Army  
Fort Worth District, Corps of Engineers  
P.O. Box 17300  
Fort Worth, Texas 76102-0300

Re: Resource Document for Lewisville Lake Programmatic  
Environmental Assessment

Dear Mr. Fickel:

Staff personnel have reviewed the above-referenced document regarding about 270 development actions being recommended for a Finding of No Significant Impact (FONSI) and being proposed for inclusion into the supplementation of the Lewisville Lake Master Plan for potential implementation of these proposed activities. These actions are being proposed by 18 public and private entities within the next 10 years on Federal lands around Lewisville Lake, Denton County, Texas.

There will be no direct impact on existing Texas Parks & Wildlife projects involving the Land and Water Conservation Fund and the Local Parks Fund (now Texas Recreation and Parks Account).

This agency concurs with assessments of the United States Fish and Wildlife Service (letter of September 10, 1999) concerning environmental impacts. They are as follows.

1. The City of Lewisville is proposing 2 utility projects within existing easements that would have significant impacts to vegetation and wildlife. One is the construction of 2, 5-million gallon aboveground water storage tanks across from Feaster Pump Station. The other is the construction of a water treatment plant and ground storage facility on about 28 acres currently leased from the US Army Corps of Engineers by Lewisville Lake Environmental Learning Area on the southeast corner of Kealy and Jones Streets. These proposed projects are on lands designated for wildlife management with a large wooded wetland and significant stand of mature

*To manage and  
conserve the natural  
and cultural resources  
of Texas for the use and  
enjoyment of present  
and future generations.*

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bottomland hardwoods. Development of these sites should be avoided or be mitigated.

2. Mitigation ratio should be based on a more appropriate rating than the value of vegetation/habitat by flood event frequency, e.g., a combination of habitat type, quality, and abundance would be more appropriate. Also, where impacts to mature bottomland hardwoods are not avoidable, a mitigation ratio should be much higher than 3:1.
3. Placement of permanent utility easements either on or adjacent to existing easements would reduce environmental impacts to these corridors and thus prevent future fragmentation of the landscape.
4. Three land use classification changes would be of benefit to fish and wildlife resources:
  - a. 50 acres leased to the City of Denton to develop a nature center with classroom facilities, labs, an auditorium, a resource library, staff offices, utilities, restrooms and a parking area.
  - b. 10 acres to support the Lewisville Lake Environmental Learning Area's proposed research laboratory/dormitory and education center building and camp sites.
  - c. 650 acres leased to the City of Denton for reforestation and a 2-cell wetland complex for their Ecosystem Restoration Program.
  - d. Reallocation of about 2,600 acres of designated low-density recreation lands to wildlife management lands.

We appreciate the opportunity to review this document.

Sincerely,

*Ray C. Telfair II*

Ray C. Telfair II, Ph.D.  
Natural Resource Specialist

